



OCT 25 2012

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # N-2253
Project # N-1112285 and N-1112286**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for Ball Metal Container Corp LLC by incorporating Authorities to Construct N-2253-15-9, '-16-9, '-17-9, '-15-10, '-16-10, and '-17-10. Project N-1112286 is for the modification of three sheet coaters with curing ovens to add Rule 4309 requirements to each permit. Project N-1112285 is for the modification of the same three sheet coaters to add a heat recovery system that transfers heat from a shared thermal oxidizer to each of the curing ovens.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on August 20, 2012. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Ruphi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,


David Warner
Director of Permit Services

DW:JH

Enclosures

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585
www.healthyairliving.com

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-15-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #2 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.7 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions, at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NO_x/MMBtu (equivalent to 2.1 ppmvd NO_x @ 19% O₂), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
27. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
41. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-16-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #3 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 9.4 MMBTU/HR YOUNG BROS. KELGRAF OVEN (SHARED WITH N-2253-18) WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The exhaust stack for the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
4. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
6. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
8. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NOx/MMBtu (equivalent to 2.1 ppmvd NOx @ 19% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O2, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
9. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
10. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
16. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
17. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
18. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
19. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
20. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
21. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
22. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

26. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
27. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
28. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
30. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
31. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
32. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
34. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
35. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
38. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
39. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
40. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
42. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 4604 and 4309] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2253-17-12

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

SHEET COATING OPERATION #4 CONSISTING OF A WAGNER MODEL 15X44-A SHEET COATER AND A 7.3 MMBTU/HR YOUNG BROS. KELGRAF OVEN WITH MAXON CYCLOMAX LOW NOX BURNERS. THE COATING APPLICATION EQUIPMENT AND THE OVEN ARE ALL VENTED TO AN 8.0 MMBTU/HR SHARED THERMAL OXIDIZER EQUIPPED WITH A HEAT RECOVERY SYSTEM THAT TRANSFERS THERMAL OXIDIZER EXHAUST INTO THE CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule and Rule 4604]
3. The VOC contaminated air stream from the coating application operation and the curing oven shall be vented to the thermal oxidizer prior to discharge into the atmosphere at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer shall be maintained at a minimum temperature of 1,490 Degrees F to provide at least 98.5% VOC capture and control and the VOC emission control system shall reduce VOC emissions , at all times, to a level which would have been achieved through the use of materials compliant with the applicable requirements of Rule 4604, Sections 5.1 and 5.4 (9/20/07). [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64]
5. The thermal oxidizer shall be equipped with an operational continuous temperature monitoring and recording device. [District NSR Rule, Rules 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. An excursion is deemed to occur when the afterburner temperature drops below the minimum operating temperature of 1490 Degrees F. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize emissions and prevent recurrence of the excursion as expeditiously as practicable. Any record of an excursion shall be reported by sending a copy of such record to the APCO within 96 hours following the occurrence. Such report shall include an explanation of the cause of the excursion and the corrective action taken. [District Rule 4604]
7. Emissions from combustion in the curing oven shall not exceed any of the following limits: 0.024 lb-NO_x/MMBtu (equivalent to 2.1 ppmvd NO_x @ 19% O₂), 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.15 lb-CO/MMBtu (equivalent to 22 ppmvd CO @ 19% O₂, or 0.005 lb-VOC/MMBtu. [District Rules 2201 and 4309]
8. Emissions from the shared thermal oxidizer, due to the combustion of natural gas, shall not exceed any of the following limits: 0.098 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.086 lb-CO/MMBtu, and 0.005 lb-VOC/MMBtu. [District Rule 2201]
9. The VOC emissions due to coating and solvent use shall not exceed 36.7 pounds during any one day. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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10. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 10,366 pounds during the first calendar quarter, 9,941 pounds during the second calendar quarter, 10,187 pounds during the third calendar quarter and 10,027 pounds during the fourth calendar quarter. The first and fourth calendar quarter VOC emissions may be increased by the amount of second and third calendar quarter VOC's not emitted. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18, shall not exceed 40,521 pounds during any consecutive 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The operator shall source test the thermal oxidizer at least once every twelve months to demonstrate compliance with the VOC control efficiency requirements. [District Rules 1081, 2520, 9.3.2, and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. The control efficiency of VOC emission control device(s) shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. [District Rule 4604] Federally Enforceable Through Title V Permit
14. Source testing of the control efficiency of VOC emission control device shall be performed under conditions representative of normal operating conditions using non-compliant coating and under conditions specified in the Permit-To-Operate. [District Rule 4604] Federally Enforceable Through Title V Permit
15. Source testing to measure NOx and CO emissions from the curing oven exhaust shall be conducted at least once every 24 months. [District Rules 2201 and 4309]
16. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309]
17. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309]
18. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309]
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]
20. All test results for NOx and CO shall be reported in ppmv @ 19% O2, corrected to dry stack conditions. [District Rule 4309]
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309]
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. If either the NO_x or CO concentrations corrected to 19% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309]
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
27. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 19% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]
29. The owner or operator shall submit a VOC Emission Control System Operation and Maintenance Plan in accordance with the provisions outlined in Section 6.5 of District Rule 4604. [District Rule 4604]
30. An operator shall not apply any coating except by the use of one or more of the following methods is utilized: flow, roll, dip, or hand application. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4604]
31. All solvent cleaning activities shall be performed using solvents with VOC contents not exceeding 25 g/l (0.21 lb/gal) unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
32. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in section 5.4.4.2 of Rule 4604 (9/20/07). [District Rule 4604] Federally Enforceable Through Title V Permit
33. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment proven to be equally effective in controlling emissions is used for cleaning. [District Rule 4604] Federally Enforceable Through Title V Permit
34. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc; coatings; adhesives; catalysts; and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4604] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. VOC content of coating(s), as applied, and of solvents shall be determined by United States Environmental Protection Agency (EPA) Test Method 24 or 24A, or South Coast Air Quality Management District (SCAQMD) Method 304 (Determination of Volatile Organic Compounds in Various Materials) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
36. The content of exempt halogenated VOCs shall be determined by using the California Air Resources Board (ARB) Test Method 432 or SCAQMD Test Method 303 (Determination of Exempt Compounds) on an annual basis, or by using the manufacturer's product formulation data and the formula for "Grams of VOC per liter of Material" as allowed in District Rule 4604, Section 3.0 (9/20/07). If the coating/solvent manufacturers provide certification that the previously mentioned methods are used to determine the VOC content, copies of the coating/solvent product data sheets and the certifications may be maintained, used to calculate the VOC content of the coating, as applied, and shall be considered compliance with this condition. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
37. Daily records of the following shall be kept: (a) The specific coatings used and the mix ratio of the components added to the coatings prior to application; (b) The volume of each coating used in gallons; (c) The specific solvent used for clean-up and surface preparation; (d) The volume of each solvent used; (e) The VOC emissions due to coating and solvent usage from this permit unit; (f). The operating temperature of the thermal oxidizer. [District Rules 1070, 2520, 9.3.2 and 4604, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
38. A list of the coatings, catalysts and reducers used, the mix ratio of the components used, the VOC content of each coating used (as applied) and of the VOC content of each solvent used for clean-up and surface preparation shall be kept. The list shall be made available to the District upon request. [District Rules 2520, 9.3.2 and 4604] Federally Enforceable Through Title V Permit
39. Records of the combined quarterly VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept. The records shall be updated at least weekly. [District Rules 1070 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. Records of the combined VOC emissions from the equipment operating under permits N-2253-15, N-2253-16, N-2253-17, and N-2253-18 (including the VOC's due to combustion), shall be kept for consecutive 12-month period. [District NSR Rule] Federally Enforceable Through Title V Permit
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